

UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT

CASE NO. 22-11150-G

L.T. Case No. 9:18-cv-80176-BB

IRA KLEIMAN, as the Personal  
Representative of the Estate of  
David Kleiman,

*Appellant,*

vs.

CRAIG WRIGHT,

*Appellee.*

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**APPELLANT'S UNNOPPOSED MOTION FOR EXTENSION OF TIME**  
**TO FILE REPLY BRIEF**

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*Counsel to Appellant Ira Kleiman as Personal Representative of the Estate of  
David Kleiman.*

## **CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Appellate Produce 26.1 and Eleventh Circuit Rule 26.1, Appellant IRA KLEIMAN, as the Personal Representative of the Estate of Dave Kleiman, respectfully submits the following Certificate of Interested Parties and Corporate Disclosure Statement:

1. The Honorable Judge Beth Bloom, *U.S. District Judge*
2. Boies Schiller Flexner LLP, *Counsel for Plaintiff-Appellant*
3. Brenner, Andrew, *Counsel for Plaintiff-Appellant*
4. BTCN 1610-491 LLC (CE)
5. Cyrulnik, Jason, *who is a former attorney at Roche Freedman LLP (n/k/a Freedman Normand Friedland LLP) and claims an interest, which the Firm disputes, in any fees paid to the Firm in connection with this matter*
6. Delich, Joseph, *Counsel for Plaintiff-Appellant*
7. Devine Goodman & Rasco LLP, *Counsel for Non-Party Andrew O'Hagan*
8. \*Economides, Constantine Philip, *Counsel for Plaintiff-Appellant*
9. Estate of David Kleiman, *Plaintiff-Appellant*
10. Fernandez, Amanda Lara, *Counsel for Defendant-Appellee*
11. Fernandez, Michael, *Counsel for Defendant-Appellee*
12. Freedman, Devin (Velvel), *Counsel for Plaintiff-Appellant*
13. Freedman Normand Friedland LLP, *Counsel for Plaintiff-Appellant*
14. Glaser, Patricia, *Counsel for Non-Party John Doe*

15. Glaser Weil Fink Howard Avchen & Shapiro LLP, *Counsel for Non-Party John Doe*
16. Harrison, Laselve, *Counsel for Plaintiff-Appellant*
17. \*Holtzman, Alexander, *Counsel for Plaintiff-Appellant*
18. Kass, Zalman, *Counsel for Defendant-Appellee*
19. Kleiman, Ira, *Plaintiff-Appellant*
20. Lagos, Stephen, *Counsel for Plaintiff-Appellant*
21. Licata, Samantha, *Counsel for Plaintiff-Appellant*
22. Lohr, Whitney, *Counsel for Defendant-Appellee*
23. \*Markoe, Zaharah, *Counsel for Defendant-Appellee*
24. McGovern, Amanda, *Counsel for Defendant-Appellee*
25. Mestre, Jorge, *Counsel for Defendant-Appellee*
26. Opportunistic Resources, LLC
27. Payne, Darrell Winston, *Counsel for Non-Party John Doe*
28. Pritt, Maxwell, *Counsel for Plaintiff-Appellant*
29. Rasco, Guy Austin, *Counsel for Non-Party Andrew O'Hagan*
30. The Honorable Judge Bruce Reinhart, *U.S. District Magistrate Judge*
31. Rivero, Andres, *Counsel for Defendant-Appellee*
32. Rivero Mestre LLP, *Counsel for Defendant-Appellee*
33. Rolnick, Alan, *Counsel for Defendant-Appellee*
34. Stearns Weaver Miller Weissler Alhadeff & Sitterson P.A., *Counsel for Non-Party John Doe*
35. Wright, Craig, *Defendant-Appellee*
36. Zack, Stephen, *Counsel for Plaintiff-Appellant*

\*No longer involved in representation

Appellant certifies that no publicly traded company or corporation has an interest in the outcome of the case of appeal.

**APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE  
REPLY BRIEF**

Appellant respectfully moves for a 45-day extension of time, through February 9, 2023, to file the reply brief in this matter. Appellee does not oppose the requested extension.

Good cause exists to grant the extension. This is a complicated case with a large record. The District Court's docket contains over 890 entries. The four-week trial transcript is nineteen volumes, and there are over 369 trial exhibits. Appellee's brief to this Court is 90-pages long, including exhibits, and it cites 82 authorities. Thus, preparation of the reply brief will require additional time, particularly in light of the upcoming Christmas, Hanukkah, and New Year holidays. Moreover, counsel of record has numerous upcoming commitments, both professional and personal, including a trial in New York beginning December 1, 2022.

No prior extensions for this brief have been requested by Appellant.

Certificate of Consultation. Pursuant to Eleventh Circuit Rule 26-1, Counsel for Appellee has authorized the undersigned to indicate that Appellee does not object to the requested extension of time.

For all the forgoing reasons, Appellant respectfully requests the Court extend the time in which to file its reply brief by 45 days, until February 9, 2023.

Dated December 1, 2022

Respectfully submitted,

s/ Devin (Velvel) Freedman

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*Counsel to Appellant Ira Kleiman as Personal Representative of the Estate of David Kleiman.*

**FED. R. APP. P. 32(g)(1) CERTIFICATE OF COMPLIANCE**

I certify that this document complies with the type-volume limitation set forth in Fed. R. App. P. 27(d)(2). This document contains 192 words, excluding the parts exempted by Fed R. App. P. 32(f) and Eleventh Circuit Rule 32-4.

This document complies with Eleventh Circuit Rule 27-1(a)(10) and the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6). It has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point Times New Roman font.

s/ Devin (Velvel) Freedman

Devin (Velvel) Freedman

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 1, 2022, I electronically filed the foregoing document with the United States Eleventh Circuit Court of appeals using CM/ECF, which will automatically provide a copy to all counsel of record.

*/s/ Devin (Velvel) Freedman*  
Devin (Velvel) Freedman